

Ralston Public School District
Entity Number 138315
Revised Funding Commitment Decision Letter Waiver Request

Ralston Public School District, entity number 138315, is requesting a waiver of the revised FCDL received from USAC. Ralston Public School District is requesting that FRN 1699032941 have the funding commitment changed to the original funding commitment due to eligibility of the item.

During a post-commitment review, USAC determined that FRN 1699032941 was ineligible due to requested item not being established on the Form 470 160022712.

Ralston Public School District filed an appeal (#117649) to request that USAC appeal their decision to reduce the FRN based on the following:

This issue was addressed during the PIA review. It has been determined that there was an error in classifying the line item when filing the Form 471 application. During the PIA review, our request was granted to change the type of the item from BMIC to Internal Connections. I have attached a letter from USAC indicating that such request can be granted.

The items listed are the support and most importantly **licensing for the wireless equipment** and not basic maintenance and technical support as listed. We request that the type of product be changed to Internal Connections. It is stated on page 5 of the FY2016 Eligible Services List that a manufacturer's warranty is classified as Internal Connections.

During FY2016, clarity was not provided regarding classification of the this type of item. Since then the program has added LICENSING to INTERNAL CONNECTIONS. However, they are stating that the item on the FRN 1699032941 was determined to be BMIIC. Question: How can a school district know the proper classification of a manufacturer's support item before they receive the bid responses? It was the school district's interpretation that they were asking for a manufacturer's warranty and licensing for the equipment.

Once again, communication from USAC was not received asking for additional support documentation or questions before a decision was made. This is clearly a disadvantage to the applicant. Applicants are required to respond to USAC within 15 days yet USAC will not hold themselves to the same standards. This is a huge issue within USAC and needs to be resolved.

For additional information or questions, please contact Natalie Brauer at natalie.brauer@esu5.org.